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Reflections on Previous Ruminations

Some Thoughts about Mining Site Eligibility and National Register Bulletin 42

My personal experience with historic mining resources is something of an odyssey. My interest was awakened during the summer of 1983, when I worked in an old mining town that was operated as a historic site by the State of Wyoming. A few years later, I relocated to Washington, DC, to work at the National Register of Historic Places. In this position, I remained very involved with historic mining issues through consultation with state historic preservation offices and other interested parties who were grappling with the complexities of nominating mining resources to the National Register. My involvement at a historic mining conference (Death Valley 1989) further refined my interest in mining site eligibility issues. This work culminated in 1992 with the publication of a National Register bulletin on historic mining resources, which I co-authored with Robert Spude.[1]

However, my current employment at Harpers Ferry National Historical Park has left me less involved with historic mining concerns. As I reflect on my previous work in this area, I find myself pondering two questions. First, did the National Register bulletin prove to be useful? Second, was the methodology contained in the bulletin based on sound principles? While my answers to these questions may lack a certain degree of objectivity, I do have some thoughts on both questions.

If the usefulness of a bulletin can be measured by the number of National Register listings which followed its publication, then this particular bulletin has not met with resounding success. Utilizing statistics supplied from the National Register computer database, I calculate that 21 historic mining properties were listed on the National Register between 1993 and early 1998. The nominations for these properties originated from 11 different states, six located to the west of the Mississippi River and five to the east. These nominations include 13 historic districts, while nine properties were nominated in connection with multiple property submissions. The geographic spread of these mining-related sites is encouraging.[2] The use of the National Park Service's multiple property nomination format and the number of historic districts also suggests that mining properties are being considered holistically, rather than as unique, technological sites. Beyond these signs of good news, it must be acknowledged that the influx of mining properties to the National Register that followed the publication of *Bulletin 42* in 1992 has been rather modest.

Having said that, I would also state that gross numbers are not the final measure of success for a National Register bulletin. As much as anything, National Register bulletins seek to draw attention to property types that have previously received insufficient recognition. An excellent example would be the bulletin issued with respect to traditional cultural properties, which has had significant consequence through its affirmation that sites of cultural value to indigenous peoples must receive professional consideration in the cultural resource management process.[3] Despite its unmistakable success, this bulletin has generated very few nominations of traditional cultural properties to the National Register. Likewise, I would hope that the value of the bulletin on historic mining resources would not be measured solely by the number of National Register listings that followed its publication. I like to think that the bulletin has increased awareness of the importance of mining resources and has helped to clarify the efforts of those attempting to nominate mining-related sites.

While the usefulness of the bulletin may be in the eye of the beholder, I continue to believe in the overall value of the bulletin's methodology. *Bulletin 42* emphasizes two fundamental points. First, because mining properties are generally located in harsh environments that have taken a toll on their historic fabric over the decades, integrity can be a problematic factor. The few crumbling structures that may remain at a historic mining site today can not be properly evaluated by simply falling back on the seven aspects of integrity[4] that are traditionally applied to historic buildings. The bulletin suggests that individuals evaluating mining resources of questionable integrity should ask whether surviving mining-related features are part of an interrelated "system." In other words, a toppled head frame may appear to lack integrity as an individual structure, but it might potentially retain sufficient integrity as an integral component of a mining system that includes extraction facilities and transportation links to a refining operation.

Bulletin 42 makes a second contribution by suggesting that the significance of intact "mining systems" should be based in part on whether the resource can be "interpreted." If a single dilapidated component of a mining operation exists as part of a larger system that can be viewed as an integrated working process and interpreted as such to the public, then it is likely to possess both integrity and significance. Integrity must be demonstrated in terms that the National Register staff will accept, but *Bulletin 42* provides further guidance in applying the integrity standards to resources that do not fit the traditional evaluation process for architecturally significant buildings.

The related concepts of envisioning individual components as parts of a larger interrelated system and asking whether the system *in toto* can be interpreted has relevance to the evaluation of a broad range of industrial resources. I have certainly found this to be true with respect to my recent responsibilities for interpretation and cultural resources management at Harpers Ferry National Historical Park. For instance, the park contains an early-19th-century industrial area known as Virginius Island. The small water-powered factories located on this island became increasingly less relevant over time as they were surpassed by more modern manufacturing technologies and frequently inundated by the very waters that powered them. By the time that the park was created in 1944, most of these industrial buildings had been damaged to the extent that only a few foundations remained on the island.

Recent floods have continued to hammer away at these fragile resources. This was especially true in 1996, when two severe floods pounded the island. Afterward, park managers had to decide whether to spend limited emergency funding to repair resources that would, after all, be impacted by further flooding in the future. At this stage, thoughts about the existence of "interpretable systems" came into play. Put more plainly, the island contains historic intake arches, which channeled water into an early canal system. As originally designed, the canals eventually arrived at a set of tapering tunnels that concentrated the water and discharged it with sufficient force to turn turbines in a cotton factory constructed in 1847-1848. After the 1996 floods, the intake arches were on the verge of collapsing, the tunnels were entirely filled with silt, and the cotton factory had been reduced to a set of ruins that could be completely destroyed by the next flood. Despite this apparent level of degradation, the complete system was still intact to the point that it could be meaningfully interpreted to the visiting public. This observation resulted in the pragmatic and defensible decision to stabilize the various components of this important hydropower system to enable it to better withstand future flooding.

I would not want to go too far in attributing the historic mining bulletin as the primary impetus for viewing cultural resources as parts of larger systems that may be interpreted to the public. The tendency to look beyond individual structures and to evaluate resources more holistically has become increasingly prevalent within the preservation and archeological communities in recent years. This positive trend is readily observed in the increasing attention that is now being paid to cultural landscapes and historic archeological complexes. I believe it is safe to say that *Bulletin 42* is a practical application of this larger trend. To the extent that these tendencies are used in an evaluative approach that helps to clarify the process for nominating mining-related properties, I can remain comfortable in extolling the professional merits of the National Register mining bulletin.

Notes

1 For additional information, see Bruce J. Noble, Jr., A National Register Perspective: Evaluating Historic Mining Resources, *CRM*, volume 12, number 2 (1989); Leo R. Barker and Ann E. Huston, eds., *Death Valley to Deadwood; Kennecott to Cripple Creek: Proceedings of the Historic Mining Conference, January 23-27, 1989* (National Park Service 1990); and, Bruce J. Noble, Jr., and Robert Spude, *National Register Bulletin 42: Guidelines for Identifying, Evaluating and Registering Historic Mining Properties* (National Park Service 1992).

2 Some comments on early drafts of the bulletin suggested that it would be less relevant for Eastern mining properties. While the listings that have taken place since 1992 might suggest otherwise, I do feel that another National Register bulletin more directly oriented to mining in the East would be appropriate.

3 See *National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties* (National Park Service 1990).

4 The seven aspects of integrity are setting, location, association, materials, design, feeling, and workmanship.

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